

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED
STATES VIRGIN ISLANDS

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.

Defendant/Third-Party Plaintiff.

JPMORGAN CHASE BANK, N.A.

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY

Third-Party Defendant.

Case Number: 1:22-cv-10904-JSR

**DECLARATION OF ELIZABETH PAIGE BOGGS IN SUPPORT OF THE
GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS'
REPLY MEMORANDUM IN SUPPORT OF MOTION TO EXCLUDE
EXPERT OPINIONS OF KIMBERLY MEHLMAN-OROZCO,
JOSEPH FONSECA, AND CARLYN IRWIN**

Pursuant to 28 U.S.C. § 1746, I, Elizabeth Paige Boggs, declare under penalty of perjury as follows:

1. I am a member in good standing of the bars of the State of Illinois, the State of Indiana, and the District of Columbia, and have been admitted *pro hac vice* to practice before this Court. I am one of the attorneys representing the Government of the United States Virgin Islands in the above-captioned action. I am a Member of the law firm of Motley Rice LLC, and my office is located at 401 9th Street NW, Suite 630, Washington, DC 20004. I am familiar with the facts

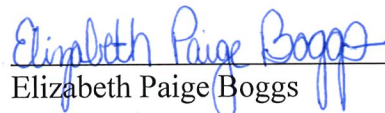
set forth herein and if called as a witness, I could and would competently testify thereto. I submit this Declaration and the attached Exhibits in support of United States Virgin Islands' Reply in Support of Motion to Exclude Defendant JPMorgan Chase's Expert Opinions of Kimberly Mehlman-Orozco, Joseph Fonseca, and Carlyn Irwin.

2. Attached hereto are true and correct copies of the following:

| Exhibit Number | Description |
|----------------|---|
| Exhibit 9 | Excerpts from the transcript of the Deposition of Dr. Kimberly Mehlman-Orozco , taken on June 30, 2023, in this action. [portions designated confidential are redacted and filed under seal] |
| Exhibit 10 | Copy of Sheryl L. Syme, et. al., <i>Human Trafficking: Red Flags for Dental Professionals</i>, DECISIONS IN DENTISTRY (Aug. 28, 2023, 12:50 PM), https://decisionsindentistry.com/article/human-trafficking-red-flags-dental-professionals/. |
| Exhibit 11 | Screenshot from the following web page taken on August 30, 2023: https://www.amazon.com/Jihadi-Next-Door-Defrauding-Terrorism/dp/1510732861 , showing the description of Dr. Mehlman-Orozco's book, "The Jihadi Next Door: How ISIS Is Forcing, Defrauding, and Coercing Your Neighbor Into Terrorism." |
| Exhibit 12 | Excerpts from the transcript of the Deposition of Joseph Fonseca , taken July 6, 2023, in this action. [portions designated confidential are redacted and filed under seal] |

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 31, 2023


Elizabeth Paige Boggs